

"Frank Basile" <frank.basile@berkshire-power.com>

09/10/2008 04:17 PM

To

Steve Calder/R1/USEPA/US@EPA

cc

"Sandy Szlachetka" <sandy.szlachetka@berkshire-power.com>,
<fred.baker@berkshire-power.com>

bcc

Subject

Berkshire Power's 2006 Natural Gas Analysis Test Results

Steve,

Through consultation with KeySpan (the testing company), we've resolved the issue relative to the 2006 gas analysis. KeySpan inadvertently sent the results to Berkshire Gas Company instead of Berkshire Power Company. We received the attached results from KeySpan (National Grid) last week which shows that they sent the report to Berkshire Gas rather than us. The lab report number was BL0608187 and the sample was taken and sent to the lab on August 11, 2006. The lab received the sample on August 15, 2006 and the total sulfur analysis was performed and the report was mistakenly sent to Berkshire Gas Company in Pittsfield, MA. Ed Connaughton from KeySpan tracked down the mistake for us and provided the documents to us last week. If additional questions or comments arise, please contact me anytime at your convenience. Thank You

Regards,

Frank

Frank Basile

General Manager

Berkshire Power Company, LLC

413-789-0075

"Frank Basile" <frank.basile@berkshire-power.com>
09/26/2008 02:51 PM

To

Steve Calder/R1/USEPA/US@EPA

cc

"Sandy Szlachetka" <sandy.szlachetka@berkshire-power.com>,
<fred.baker@berkshire-power.com>
bcc

Subject

Data Requests

Steve,

As discussed, please find your data requests. First, you'll find the "Twelve Month Rolling" totals for all of the pollutants listed in Table 3 of the Berkshire Power Operating Permit. These rolling totals start with June 2008 and go back for three years, as requested. The numbers were prepared using the same method as our source registrations, using EDR data, hourly CEMS data for CO, VOC, and NH3, and then using the Operating Permit emission limits for pollutants that aren't continuously monitored.

Second, I've included copies of our O&M records generated through the plant's Computerized Maintenance Management System (CMMS) for the past two years, as requested. Additionally, as noted while we were in the CEMS enclosure during your visit, we have a log book which details all of the O&M tasks with hand-written entries by our Instrument and Controls staff.

Please contact me anytime at your convenience if questions or comments arise, or if anything additional is needed / expected. Thank You

Regards,

Frank

----- Original Message -----

From: Frank Basile

To: calder.steve@epa.gov

Cc: Sandy Szlachetka ; fred.baker@berkshire-power.com

Sent: Wednesday, September 10, 2008 4:17 PM

Subject: Berkshire Power's 2006 Natural Gas Analysis Test Results

Steve,

Through consultation with KeySpan (the testing company), we've resolved the issue relative to the 2006 gas analysis. KeySpan inadvertently sent the results to Berkshire Gas Company instead of Berkshire Power Company. We received the attached results from KeySpan (National Grid) last week which shows that they sent the report to Berkshire Gas rather than us. The lab report number was BL0608187 and the sample was taken and sent to

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Regards,
Frank

Frank Basile
General Manager
Berkshire Power Company, LLC
413-789-0075

EU1 & EU2 Emission Limits (Tons per year, 12-month rolling)

NOx	PM	CO	VOC	SO2	Sulfuric Acid	NH3	CH2O
109	106	183	47	56	18.9	109	16.8

**EU3 Emission Limit
(Tons per year, 12-month rolling)**

PM
4.6

EU1 & EU2 12-Month Rolling Emissions (tons)

	NOx	PM	CO	VOC	SO2	Sulfuric Acid	NH3	CH2O
Jun-05	56.6	46.8	34.6	21.5	2.7	4.5	17.4	11.0
Jul-05	56.8	46.9	33.2	21.6	2.7	4.5	17.9	11.1
Aug-05	57.7	48.3	32.8	22.0	2.8	4.6	19.9	11.4
Sep-05	57.6	49.8	32.5	22.7	2.8	4.7	21.8	11.7
Oct-05	58.0	48.9	34.3	22.6	2.8	4.7	22.1	11.6
Nov-05	57.3	47.9	35.3	22.3	2.7	4.6	21.7	11.3
Dec-05	54.9	45.9	34.4	21.6	2.6	4.4	21.2	10.9
Jan-06	53.5	44.7	34.4	21.1	2.5	4.3	20.5	10.7
Feb-06	52.5	42.3	33.1	20.1	2.4	4.0	19.8	10.1
Mar-06	48.7	38.4	31.9	18.3	2.2	3.7	18.5	9.2
Apr-06	45.0	34.6	30.8	16.6	2.0	3.3	16.4	8.2
May-06	43.6	31.6	30.7	15.4	1.8	3.0	14.8	7.5
Jun-06	43.4	30.7	31.0	15.1	1.7	2.9	14.3	7.3
Jul-06	44.9	31.3	32.0	15.3	1.8	3.0	13.8	7.4
Aug-06	44.8	29.9	32.4	14.8	1.7	2.8	12.6	7.0
Sep-06	45.0	27.8	32.6	13.9	1.5	2.7	10.9	6.5
Oct-06	44.7	27.9	30.0	13.7	1.5	2.7	11.3	6.4
Nov-06	42.1	26.5	27.3	12.9	1.5	2.5	10.8	6.0
Dec-06	41.3	25.1	25.4	12.3	1.4	2.4	10.2	5.7
Jan-07	44.7	27.2	25.8	13.1	1.5	2.6	11.0	6.1
Feb-07	46.1	28.0	25.6	13.1	1.6	2.7	11.2	6.3
Mar-07	48.3	30.4	27.1	14.1	1.7	2.9	11.9	6.8
Apr-07	51.1	32.7	28.3	15.3	1.8	3.1	12.6	7.3
May-07	52.0	33.6	29.7	16.6	1.9	3.2	13.0	7.4
Jun-07	49.4	32.2	28.4	16.0	1.8	3.1	12.6	7.1
Jul-07	47.6	31.8	29.5	16.0	1.8	3.0	11.9	7.0
Aug-07	47.3	32.2	31.1	16.5	1.8	3.1	10.9	7.1
Sep-07	46.3	33.3	32.4	17.0	1.9	3.2	10.4	7.3
Oct-07	45.4	33.3	33.5	16.9	1.9	3.2	9.2	7.3
Nov-07	66.4	36.7	35.9	19.3	2.1	3.5	10.1	8.1
Dec-07	68.9	39.8	38.0	21.4	2.3	3.8	11.0	8.7
Jan-08	66.1	39.6	38.4	21.9	2.3	3.8	10.3	8.7
Feb-08	65.1	38.7	38.7	22.2	2.2	3.7	9.6	8.5
Mar-08	63.3	37.0	37.7	21.7	2.1	3.5	9.1	8.2
Apr-08	64.0	38.7	37.6	23.9	2.2	3.7	10.3	8.5
May-08	64.4	40.8	36.0	25.3	2.3	3.9	11.1	9.0
Jun-08	67.6	43.9	37.7	31.3	2.5	4.2	12.0	9.6

EU3 12-Month Rolling Emissions (tons)

PM
3.1
3.1
3.2
3.3
3.3
3.2
3.1
3.0
2.9
2.6
2.3
2.1
2.1
2.1
2.0
1.8
1.8
1.7
1.6
1.7
1.8
1.9
2.1
2.1
2.0
2.0
2.0
2.1
2.1
2.3
2.5
2.5
2.4
2.3
2.4
2.5
2.7

12-month rolling emission limits for EU1, EU2, and EU3 based on Operating Permit Table 3 (9/12/2003)

Emission factor for PM based on Operating Permit Table 3 (9/12/2003)

Emission factor for formaldehyde (lb/hr) based on Operating Permit Table 3 (9/12/2003)

Emission factor for sulfuric acid mist (lb/hr) based on Operating Permit Table 3 (9/12/2003)

Emissions of CO based on hourly average emission rates recorded by DAHS

Emissions of VOC based on cumulative monthly totals recorded by DAHS

Emissions of NH3 based on cumulative monthly totals recorded by DAHS

Emissions for NOx and SO2 based on emissions reported in quarterly EDRs

Cooling tower emissions based on an annual permitted emission rate of 4.6 tons PM at 8,760 hours of operation